

Christopher Geddis

From: Bonner, Kelly <KABonner@duanemorris.com>
Sent: Monday, July 19, 2021 12:19 PM
To: 'TIV@stevenslee.com'; Vanaskie, Thomas I.; 'njdnef_Williams@njdcourts.gov'
Cc: Christopher Geddis; Goldberg, Seth A.; Bazan, Rebecca
Subject: FW: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - Plaintiffs' Brief on ZHP's Waiver of Certain Confidentiality Designations

Dear Judge Vanaskie and Judge Williams,

The ZHP Parties respectfully request a two-day extension to file their brief in opposition to Plaintiffs' brief regarding an alleged waiver of certain confidentiality designations by the ZHP Parties, given that Plaintiffs filed their moving brief on this topic two days after the deadline set by the Court for that filing in Special Master Order No. 31.

Plaintiffs have consented to the ZHP Parties' requested extension, which would be July 22, 2021.

Thank you,
Kelly Bonner

Kelly A. Bonner
Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>
Sent: Monday, July 19, 2021 9:37 AM
To: Bonner, Kelly <KABonner@duanemorris.com>
Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>
Subject: RE: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - Plaintiffs' Brief on ZHP's Waiver of Certain Confidentiality Designations

Hi Kelly,

We consent.

Best,
Chris

From: Bonner, Kelly <KABonner@duanemorris.com>
Sent: Monday, July 19, 2021 8:23 AM

To: Christopher Geddis <CGeddis@mazieslater.com>

Cc: Goldberg, Seth A. <SAGoldberg@duanemorris.com>; Bazan, Rebecca <REBazan@duanemorris.com>

Subject: Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - Plaintiffs' Brief on ZHP's Waiver of Certain Confidentiality Designations

Counsel,

Please advise regarding the ZHP Parties's request below as soon as possible today.

Thank you,
Kelly

Sent from my iPhone

On Jul 17, 2021, at 11:31 AM, Bonner, Kelly <KABonner@duanemorris.com> wrote:

Counsel,

Given that Plaintiffs filed their motion two days after the Court's ordered deadline (see attached), please confirm that Plaintiffs do not object to the ZHP Parties' response deadline being extended by an equal amount of time as ordered by Judge Vanaskie (to July 22, 2021).

Thank you,
Kelly

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Associate

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From: Christopher Geddis <CGeddis@mazieslater.com>

Sent: Friday, July 16, 2021 6:36 PM

To: Vanaskie, Thomas I. <thomas.vanaskie@stevenslee.com>; 'TIV@stevenslee.com' <TIV@stevenslee.com>

Cc: DECValsartan@btlaw.com; Bonner, Kelly <KABonner@duanemorris.com>; 'valpec@kirtlandpackard.com' <valpec@kirtlandpackard.com>

Subject: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation, MDL 2875 - Plaintiffs' Brief on ZHP's Waiver of Certain Confidentiality Designations

Dear Judge Vanaskie,

Plaintiffs' unredacted brief on ZHP's waiver of certain confidentiality designations is available at the following link:

https://www.dropbox.com/sh/p2kb9fpihrt117/AAAN_BLOP_zv6pegbfz0jNIia?dl=0.

The underlying unredacted court submissions are also available in separate folders at this link.

If you have any trouble accessing these documents, please let me know.

Respectfully,
Chris

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<Special Master Order No. 31.pdf>

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